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UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
MOTION *IN LIMINE* NO. 2 AND  
WAYMO'S BRIEF IN OPPOSITION  
THERE TO**

Judge: The Honorable William Alsup  
Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal certain exhibits to Defendants’ Motions *in Limine* No. 2 and Waymo’s Brief in Opposition to Defendants’ Motion *in Limine* No. 2. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 4 to the Declaration of Martha L. Goodman in Support of Defendants’ Motions In Limine Nos. 2 and 22-25 (“Goodman Decl.”)	Entire Document	Plaintiff

The entirety of Exhibit 4 to the Goodman Decl. contains information that Waymo designated or considers “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case, or that Waymo asked Uber to file under seal. (*See* Goodman Decl. ¶ 3.)

Defendants served Waymo LLC with this Administrative Motion to File Documents Under Seal on September 13, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

Dated: September 13, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Karen L. Dunn

Karen L. Dunn

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UBER TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC